ST TE OF CONNECTICU
DEPARTMENT OF ENVIRONMENTAL PROTECTION

RCRA RECORDS CENTER
FACILITY MACDERMID
I.D. NO. CTD001164599
FILE LOC. R-1C
OTHER RDMS# 100869

MACDermid Waterbury Ins

7/92 Rev.

RCRA (HAZARDOUS WASTE) INSPECTION REPORT
TREATMENT/STORAGE/DISPOSAL FACILITY

RDMS DocID 00100869

Name(s) of inspector(s): Mark Parker
Date(s) of inspection: 5/26+28/93 Complaint Number: _____
Previous RCRA inspection date: 9/16/91 Active RCRA enforcement #: _____

SITE INFORMATION

EPA ID No.: CTD 981062854
Site Name (& AKA/DBA if any): MacDermid Inc.
Street Address: 245 Freight Street
Mailing Address: 245 Freight Street, Waterbury, Ct. 06702
Contact Name(s) and Title: Cherrie Gillis, Mgr. Regulator Affairs: Adla Reddy.
Contact Phone No.: 575-7947

STATUS (actual - operating)

___ CESQG	___ Storage	___ Interim Status	___ Recycle/Reclaim
___ SQG (100-1000kg/mo)	___ Treatment	___ Permitted facility	___ Unknown
✓ Lg Quantity Generator	___ Disposal	___ CT Regulated facility	___ Other:
___ Transporter	___ Post closure	___ Commercial facility	
___ Burner/Blender	units	___ Receiving waste from off-site	

Notified as: L.Q.G., Transporter + Storage
Any discrepancies between notification/Part A/B & actual operation:
Yes ✓ No___ (describe): Storage areas closed out. Closure plan submitted. LQG only.
If yes, has a status change been requested: Yes ✓ No___
Comments (e.g., type of change requested): From Storage to LQ.G. 10/10/91
Part A revised 10/10/91 15,000 gal. Metal hydrox. sludge, S02
1,100 gals. Lab waste, S01

TYPE OF WASTE HANDLED

✓ Ignitables (D001)	✓ F or K listed wastes	___ Used oil (regulated under 266)
✓ Corrosives (D002)	✓ P or U listed wastes	✓ CT regulated wastes
___ Reactives (D003)	___ Precious metals	___ Unknown
✓ TCLP (D004-43)	___ Haz. scrap metal	___ Other: _____

HANDLING METHOD (actual)

✓ Containers (# ≈ 15) _ Waste piles (#)
_ Tanks-above ground (#) ✓ Wastewater treatment
_ Tanks-underground (#) _ Incinerator/Thermal treatment
_ Surface impoundments (#) _ Chem/Phys/Bio treatment
_ Landfill
✓ Other: Lab pack staging area (in W.W.T. room) ≈ 100 containers various sizes, lab chemicals.

SITE DESCRIPTION

Proximity to residential areas/surface water/recharge zone, etc: Down town waterbury area. Mixed commercial industrial. Property borders the Naugatuck river.

Water supply (if wells, give approximate location): City Water supply.

Types of waste/water discharges: Sanitary waste and W.W.T.S. discharges to city sewer (P.O.T.W.)

Evidence of on-site disposal: Yes___ No ✓. If yes, identify location, amount & frequency, length of time, disposal sites used, etc:

Groundwater monitoring wells on-site: Yes___ No ✓.
If yes: ___RCRA (complete GWM checklist) Non-RCRA (briefly describe why installed and any information available):

GW classification (if known): GB Property owned/~~leased~~: by MacDermid Inc.

Previous occupants of site: ?

Comments: Buildings and grounds on 6 acres in flood plain area bordering the Naugatuc river.

SITE ACTIVITY

Date established at present location: 1985

No. employees/shifts _____ Type of activity: R+D of Specialty Chemicals

Products: Development of Specialty chemicals for metal finishing, microelectronics and electronics industries.

Describe processes (particularly those involving chemicals):

*Leever Building (245 Freight Street)

The first and second floors house offices for executive management, marketing/sales, support staff and clerical. The third floor contains offices for lab staff, accounting files storage rooms and R+D labs. These R+D labs include Organic Synthesis, Formulations lab, customer sample Analytical lab and MIS Computer lab. The Organic Synthesis lab develops new organic solutions for coating (includes imidizol synthesis). A methanol cleaner is used to clean glass ware. A one gallon waste container is kept in a lab hood until full and is then transfered to containers in the Waste Water Treatment room in the Freight Street building. Unknown chemical wastes are brought to the W.W.T. room, (where the Hazardous waste <90 day storage area is) sampled and stored until analysis results are received, then shipped off site. The Formulations lab develops plating solutions for finishing industries. Small volumes of waste solutions are generated (usually nickel solutions).

The Analytical lab analyses customer and potential customer sample solutions of plating baths. Samples contain mixed wastes (some cyanide). Samples are held for 3 to 4 weeks then disposed of in either a waste cyanide drum or other appropriate containers. A satellite storage room on the third floor has a concrete floor with epoxy sealant and 2 overpack drums with containers inside for cyanide waste and Nickel chloride waste. When these are full (approx. 1 yr) they're brought down to the haz. wst. storage area and shipped off site.

Continued on page 20.

WASTE PROFILE

WASTE STREAM	EPA WASTE #	EST. GENERATION RATE (amount:time)	HANDLING METHOD	TRANS	TSD
Cyanide Wastes	D002 F007	~110 gals/yr	drums	Price Trucking	Laidlaw N.C.
Mixed Solvent Wastes	D001 F003	~55 gals/yr	drums	Laidlaw	Laidlaw
Waste Acids	D002 D008	~55 gals/yr	drums	"	"
Waste plating baths	D002 D007	amount varies	drums	"	"
Lab packs	D, F, P and U codes	amount varies	lab pack drums	"	"
Metal Hydroxide sludge	F006	~7,000 gals/3-4 mos.	tank	EWR	EWR
Nickel Chloride wste	D002	~110 gals/yr.	drum	MacDermid	MacDermid Huntington Ave
Electroless Nickel waste	D002 D008	~55 gals/3-4 mos.	drum	"	"
Electroless copper	CR04	~165 gals/mo.	drum	MacDermid	MacDermid
Odd Haz. Wastes	D001 F wastes	amount varies	drum	Price Trucking	ENSCO (Arkansas)

Comments: Mercury Wastes are shipped to Mercury Refining, Latham N.Y. every 2 years.

RCRA (the statute) WASTE MINIMIZATION PROGRAM (GOR)

Is a program in place (If yes, generally describe components of program, wastes addressed, reductions achieved): Yes, lab analysis/screening of customer samples to prevent extra hazardous wastes from enter Macdermid lab wastes. Segregation of wastes and lab packing staging area. Employee education and good housekeeping and lab practices.

40 CFR 262.11[1] HAZARDOUS WASTE DETERMINATIONS (GHW) 22a-449(c)-102(a)[2]

Determination conducted for all waste streams: Yes ✓ No ___ (explain): Waste Analysis plan identifies all waste streams. First time customers' samples initial analysis. Tanker trucks are grab sampled and analyzed. All waste streams are TCLP analyzed for LDR requirements.

[1] See 40 CFR 264 for permitted facilities.

[2] See 22a-449(c)-104 for permitted facilities.

40 CFR 265.70-77/262.21 MANIFESTS (DMR) 22a-449(c)-105(a) & 102(b)(3)

Dates/months of manifests reviewed: 1/92 – 5/93
Manifests used for all hazardous waste shipments: Yes ✓ No___ (explain): _____
Appropriate copy(ies) on-site: Yes ✓ No___ (explain): _____
Any exception (generators); discrepancy or unmanifested waste reports (facilities): Yes___ No ✓
(explain): _____
Comments (e.g., CT reg. wastes): Manifests and LOR forms are also used for the Conn. regulated waste solutions.

(See special checklist for land ban manifest requirements)

40 CFR 265.75 ANNUAL HAZARDOUS WASTE REPORT (DOR) 22a-449(c)-105(a)(2)(D)

Reports filed on an annual basis: Yes ✓ No___: _____
Comments: _____

40 CFR 262.50-58 EXPORT/IMPORT ACTIVITIES (DEX) 22a-449(c)-102(a)(1)
40 CFR 262.20 & 265.12 22a-449(c)-105(a)(1)
Has any hazardous waste been exported/imported during the last 3 years: Yes___ No ✓
(If No, skip the rest of this section).
Exports:
Do they attach a current Acknowledgement of Consent form for each export shipment:
Yes___ No___ (explain): _____
Have they filed with EPA's administrator by March 1 of each year an annual report summarizing the previous year's export activities: Yes___ No___. _____
In the past 3 years, have they ever had waste returned to the U.S., & if so, have appropriate exception reports been filed: Yes___ (explain) No___ _____
Have manifests for export shipments been completed according to the special manifest requirements (e.g., additional language): Yes___ No___ (explain): _____
Imports:
Are wastes received from a foreign source: Yes___ No___
If yes, has notice been filed with EPA: Yes___ No___: _____
Comments: _____

40 CFR 265.15 INSPECTION SCHEDULE & LOG (DIS) 22a-449(c)-105(a) & 102(b)(2)

Does contact claim inspections are conducted: Yes.
Written inspection schedule: Yes, found in Part B permit application
Inspection log (adequacy of contents: date, time, items inspected, corrective action): Appears adequate for storage areas. Needs better documentation for emergency equipmen
Documentation:

Daily

All Loading/unloading areas subject to spills (when in use): _____
Tanks Containment, detection, ancillary equip: _____
Trtmt Treatment equipment: _____
Impd Freeboard level: _____
Incin. Combustion/emission control instruments every 15 min.: _____
Incin. Inc. & assoc. equipment for leaks/spills/emissions, check alarms & shutdown controls: _____

Weekly

Cntainrs Physical condition: Appears adequate
Cntainrs Containment system: " "
Cntainrs Labels, marking, dates: " "
Impdmnts Surface impoundments & dikes: N/A
Battery Storage area (no log required): N/A

Other

All Safety & emergency equipment: See comments.
Tanks Cathodic protection (w/i 6 mos.; then yearly): _____
Tanks Impressed current (every other month): _____
LD Monitoring equip (wells, etc.): _____
PCLD Post-closure inspections: _____
Comments (e.g., failure to correct malfunctions/deficiencies/chronic problems): The equipment appears to be in good condition and in proper locations, however the inspection log for some of the equipment lacks detail and verification of inspection.

40 CFR 265.16 PERSONNEL TRAINING RECORDS (DPR) 22a-449(c)-105(a)(1)(D)

Training conducted: Yes ✓ No__: _____
Last annual review (date): 3/29/93 New employees: _____
Written description of training: Yes, on site in Part B permit application
Job title, description & name of employee: Appears adequate.
Records maintained on-site until closure/3 yrs. for former employees: Yes, see comments.
Comments (if SQG, describe): Copies of training certificates are kept in files and a record of individual employee training records are maintained on computer.

40 CFR 265.50-56/262.34(a)(4) CONTINGENCY PLAN (DCP) 22a-449(c)-105(a) & 102(a)

Plan on-site Yes ✓ No ___. Date: 9/15/92 revision Prepared by: MacDermid
Arrangements with/plan to local authorities: Appears adequate
(police, fire, hospital, emergency response team)
Emergency procedures (fires, explosions, releases/spills): Yes, addressed.
Emergency Coordinator(s) name, address, home & office phone: Yes, revised 9/15/92
Emergency equipment list, location, description, capabilities: Appears adequate.
Evacuation plan (signal, primary & alternate routes): " "
Comments:

CFR 265.30-37/262.34(a)(4) PREPAREDNESS & PREVENTION (DPP) 22a-449(c)-105(a)&102(a)

Immediately accessible to internal communications/alarm system: Pull alarm and phone P.A.
Telephone/hand-held two-way radio: Telephone.
Emergency equipment (fire extinguishers/control, spill control, decontamination equip.): Fire extinguishers, spill kit stations, SCBA stations.
Equipment maintenance: Appears adequate
Access to emergency equipment: Appears adequate.
Adequate aisle space: " "
Source of water in the event of a fire: Sprinkler, hydrants > city water
Comments: The Naugatuck river could also be used for an emergency water supply.

40 CFR 265.17 IGNITABLES/REACTIVES/INCOMPATIBLES (DSC) 22a-449(c)-105(a)(1)

Ignitable & reactive wastes separated from sources of ignition or reaction & handled per 265.17: ___ Yes.
"No smoking" signs (for ignitable & reactive waste): Yes, Present.
Comments:

40 CFR 265.13(b) WASTE ANALYSIS PLAN (DWA) 22a-449(c)-105(a)

Plan on-site: Yes ✓ No___. Date: 10/7/91 revised Prepared by: HRP

Does plan include: Parameters: Yes

(including TCLP Test methods: Yes

and LDR update) Sampling methods: Yes

Frequency: initial, spot tests, annual and as needed.

Copy of results on-site: Yes

Comments:

40 CFR 265.73 & 265.94(a)(1) OPERATING RECORDS (DRR) 22a-449(c)-105(a)

Are the following records maintained on-site:

Waste received from off-site: No From on-site: Yes See comments

Waste description: Yes

Waste quantity: Yes

Methods of & dates of storage/treatment/disposal: Yes ✓ No___.

Waste inventory (including type, volume & location):

in storage: Yes

disposed of on-site (recorded on map):

cross-reference to specific manifest:

Analytical results for:

all waste:

monitoring wells:

trial test (to assure compatibility with tanks, impoundments or waste piles):

Report/summary of any incident requiring implementation of Contingency Plan:

Records & results of inspections: Yes

Closure/Post closure cost estimates:

Comments: The company has requested status change to generator and appears to be operating as a generator only. The company is still maintaining an informal operating record.

40 CFR 265.110-120 CLOSURE PLAN (DCL) 22a-449(c)-105(a)

Have any regulated units closed: Yes ✓ No___.

If Yes, is closure certified by owner/P.E.: Yes ✓ No___

If Yes, date of certification: 3/31/92 On-file at DEP: Yes ✓ No___

Plan on-site: Yes ✓ No___. Date: _____ Prepared by: HRP Associates

Status of closure plan (approved & date): Approved 9/30/91

Are all regulated units covered (compare to Part A & on-site operations): Yes.

Does plan include (indicate presence/absence, comment on adequacy):

Estimate of maximum inventory: Yes

Description of how each unit will be closed & methods to be used during closure: Yes.

Description of steps needed to remove/decontaminate equip/structures/soils: Yes.

Schedule for closure of each unit & for final closure (time & milestones): Yes, 360 days.

* Estimate of expected year of final closure: 2050 A.D.

Comments (e.g., operations do not match plan, amendments needed): _____

* Expected date of closure required only for facilities using trust funds with <20 years of remaining life, & for facilities without approved closure plans).

40 CFR 265.117,118 POST-CLOSURE PLAN (DCL) N/A 22a-449(c)-105(a)
(disposal facilities only)

Plan on-site: Yes___ No___. Date: _____ Prepared by: _____

Status of Post-closure plan (e.g., approved & date): _____

Does plan include description & frequency of:

monitoring activities: _____

maintenance & inspection activities (e.g., integrity of cap, gwm): _____

name, address, telephone no. of post-closure contact: _____

length of post-closure period: _____

Certification to the Commissioner that notation on deed has been recorded: _____

Yes___ No___. ✓

Record sent to the Commissioner of the type, location & quantity of hazardous waste disposed of in each cell/disposal unit: Yes___ No___

Comments (e.g., amendments needed, etc.): _____

FINANCIAL REQUIREMENTS (DFR)

40 CFR 265.142 CLOSURE COST ESTIMATE 22a-449-105(a)(1)

Estimate on-site: Yes ✓ No___. Amount of estimate: $ 72,671.00
Date of most recent adjustment: July 1992
Comments: _____

40 CFR 265.143 FINANCIAL ASSURANCE FOR CLOSURE 22a-449(c)-105(a)(1)

Type of mechanism (trust fund, surety bond, letter of credit, insurance, financial test/corporate guarantee): Financial test/corporate guarantee
Amount of coverage: $ 2,000,000.00
Comments: _____

40 CFR 265.144 POST-CLOSURE COST ESTIMATE 22a-449-105(a)(1)
(disposal facilities only) N/A

Estimate on-site: Yes___ No___. Amount of estimate: $ _____
Date of most recent adjustment: _____
Comments: _____

40 CFR 265.145 FINANCIAL ASSURANCE FOR POST-CLOSURE 22a-449-105(a)(1)
(disposal facilities only) N/A

Type of mechanism: _____ Amount of coverage: $ _____
Comments: _____

40 CFR 265.147 LIABILITY INSURANCE 22a-449(c)-105(a)(1)

Sudden accidental occurrences (all TSDF's)
Type of mechanism (insurance, financial test/guarantee liability coverage, letter of credit, surety bond, trust fund, combination): Financial test / Corporate guarantee
Amount of coverage: $ 2,000,000.00 annual aggregate
If no insurance, date of most recent attempt to obtain: _____

Non-sudden accidental occurrences (impoundments, landfills)
Type of mechanism: Financial Test. Amount of coverage: $ 2,000,000. or annual aggregate
If no insurance, date of most recent attempt to obtain: _____

Comments (e.g., filed Chapter 11, etc.): _____

40 CFR 265.14 SITE SECURITY (DSS) 22a-449(c)-105(a)

Does contact claim that physical contact/disturbance of waste would not cause injury/a violation of 40 CFR Part 265/264: Yes___ No ✓.

If No, is there:

24-hr. surveillance system (describe): Electronic Security (Sonitrol)

OR barrier completely surrounding active portion (describe): Doors locked, card activated ope

AND Means to control entry (describe): Fences and gates around property, locked @ 10 pm

Danger-Unauthorized Personnel Keep Out signs at each entrance to active portion, legible at 25': Yes.

Comments: _____

40 CFR 262.34(c)(1) SATELLITE ACCUMULATION (DMC) 22a-449(c)-102(a)

Approx. number of satellite storage areas: 6

Less than 55 gallons (or 1 qt. acutely haz) per waste stream per satellite accumulation area: Yes.

Containers marked & contents described: Appears adequate

Containers closed when not in use: Yes.

Comments: _____

40 CFR 265.170-177 CONTAINERS (DMC) 22a-449(c)-105(a) & 102(a)

Number of areas: One

Location(s): Waste Water treatment room of the Research + Technical building.

Impermeable base (type): Concrete Secondary containment*: floor sloped with sump.

Approx. number & sizes of containers: 4, fifty five gallon drums, also see comments

Type(s): steel ✓ poly ✓ fiber___ bag/sack___ lab pack ✓ roll-off___

Other: _____

Management of containers:

Condition (leaks, ruptures, corrosion, heat, pressure): Appears adequate

Containers closed when not in use: Yes

50 ft. buffer zone for ignitable and reactive waste*: Yes.

Incompatibles separated by dike/wall, etc. Appears to be adequate separation.

Storage less than 90 days (LQG) or 180-270 days (SQG): Yes

Comments: The lab pack staging area contained several containers of varying size from pint to gallon size containers.

* = Not applicable to Small Quantity Generators

40 CFR 262.30-34 OTHER PRE-TRANSPORT REQUIREMENTS (DPT) 22a-449(c)-102(a)

Packaging: Appears adequate
Labelling (if applicable, DOT haz.class): Ye
Marking (Words "Hazardous Waste", generator name & address, manifest doc. no. if being shipped): Yes.
Contents described (e.g., chemical name): Yes.
Proper DOT shipping name: N/A, not ready for shipping.
Accumulation date: Yes.
Comments:

40 CFR 265.190-201 WASTE TANKS (DTR) 22a-449(c)-105(a)
262.34 (generators)

Tank inventory/description (note above/underground, location, age, construction, ancillary equipment, capacity & waste type): Three 17,000 gallon tanks are part of the waste water treatment system.

Adequate secondary containment for tank & ancillary equip: Yes ✓ No___ N/A___
Comments:

Describe leak detection system (including ancillary equip.): N/A

Describe corrosion protection system:

Special requirements for ignitable & reactive waste: Yes___ No___ N/A ✓:

Words "Hazardous Waste" and description of contents:
Evidence of releases/leaks: No___ Yes___.
If yes, describe:
Was release reported: Yes___ No___. If yes, date (if known):
Certification of major repairs to tank Yes___ No___ N/A___.
Any out-of service tanks: Yes___ No___. If yes, describe:
Comments:

Tanks Section continued on next page

Tanks, continued...

Existing Tank Systems (installed before 1/12/87)

Written tank integrity assessment on-site (P.E.certified) Yes___ No___ N/A✓.
Does assessment address all required items: Yes___ No___: _____
Comments: _____

New Tank Systems (installed after 1/12/87)

Written tank design, construction & installation assessment on-site (P.E. certified):
Yes___ No___ N/A✓.
Does assessment address all required items: Yes___ No___: _____
Documented installation & tightness test on-site: Yes___ No___
Comments: _____

Other comments on tank systems: _____

40 CFR 265.220-230 SURFACE IMPOUNDMENTS (DSI) 22a-449(c)-105(a)
(Pits, ponds & lagoons. If closed as a landfill, complete "Landfills" section). N/A

Description (number, approx. dimensions, type of waste, etc): _____
Protective cover on dike: _____ 2' freeboard: _____
Special requirements for ignitable & reactive wastes: _____
Evidence of fire, explosion, leak: _____
Liners or alternative designs: _____
Leachate collection system (for new/expanded impoundments): _____
Comments: _____

40 CFR 265.250-257 WASTE PILES (DWP) 22a-449(c)-105(a)

(if closed as a landfill, complete "Landfills" section instead)

N/A

Description (number, approx. size, type of waste, location, etc.): _____

Wind erosion control: _____

Impermeable base: _____

Run-on/run-off control & prevention: _____

Special requirements for ignitable & reactive wastes: _____

Separation of incompatible waste: _____

Waste analysis: _____

Evidence of fire, explosion, leak: _____

Leachate control system: _____

Comments: _____

40 CFR 265.301-315 LANDFILLS (DLF) 22a-449(c)-105(a)(1)(E)

N/A

Description (number, capacity, approx. dimensions, type of waste, monofill, etc): _____

Run-on control & run-off collection (treat if necessary): _____

Wind dispersal control: _____

Special requirements for ignitable/reactive wastes: _____

Records of dimensions, contents & locations of each waste type: _____

Liners & leachate collection systems for new/replacement/lateral expansion units OR alternative design & operating practices: _____

Maintenance of cap/cover integrity (i.e., protect from erosion, wood plant growth, access by heavy vehicles, etc.): _____

Maintenance and protection of survey benchmarks: _____

Comments: _____

40 CFR 265.340-345 INCINERATORS/THERMAL TREATMENT (DIN, 22a-449(c)-105(a)

Description of unit(s): N/A

What is unit primarily used for (destruction/heat or energy recovery): ✓

Waste analyses performed:
For incinerators: Heating value of waste (BTU):
Halogen content:
Sulfur content:
Lead concentration:
Mercury concentration (maximum allowable):
Continuous/Batch operation:
Start-up & shut down procedures (describe any problems):

Is hazardous waste fed into incinerator/furnace when not at steady state:

Is incinerator certified to burn F020, 21, 22, 23, 26 or F027: Yes___ No___
Comments (e.g., trial burns, open burning, etc.):

40 CFR 266 Subparts C-G RECYCLE/RECLAIM (DRC) 22a-449(c)-101(c) & 106

Is hazardous waste recycled on-site: Yes___ No ✓
If yes, does the closed loop exemption apply:
If yes, has a Recycling Registration been filed:

40 CFR 261.1(c)(8) & 261.6 **Accumulation for recycling** 22a-449(c)-101(a) & (c)

Approx. number of containers:
Type of material:
Accumulation date present:
Less than one year storage:
Clearly marked and labelled:
Is documentation available that the material:
- is potentially recyclable & has a feasible means of being recycled: Yes___ No___:
- all recycled within one year of accumulation dates: Yes___ No___:
Comments:

40 CFR 266 Subpart C Use Constituting Disposal 22a-449(c)-106(a)

Are any recyclable materials used in a manner constituting disposal: No

If yes, explain: _____

Comments: _____

40 CFR 261.1(c)(6) & 261.6(a)(3) Scrap Metals 22a-449(c)-101(a) & (c)

Does the facility generate, accept, store, treat, or dispose of any waste scrap metals which are ignitable or reactive: Yes___ No✓

If yes, are the materials being handled as hazardous wastes: Yes___ No___

Comments: _____

40 CFR 266, Subpart G Spent Lead Acid Batteries Being Reclaimed 22a-449(c)-106(a) & (c)

Storage and Handling: N/A

Batteries open or closed: _____

Evidence of leaks, ruptures, spills or poor handling procedures: _____

Separation from incompatibles: _____

Stored on impermeable surface: _____

Accumulation over 20,000 kg: Yes___ No___

If yes, has a Recycling Registration been filed? Yes___ No___

Treatment:

Are batteries cracked or processed on-site: _____

Do they have a permit for this activity: _____

Comments: _____

Note: persons who generate, transport, store or collect spent lead-acid batteries other than for recycling must comply with sections 100-110 inclusive.

40 CFR 266, Subpart D Hazardous waste fuel 22a-449(c)-106(a)

(continued on next page)

Does the facility market hazardous waste fuel: Yes___ No✓

If yes, have they notified of this activity: _____

Do they have burner certifications for all customers on site: (40 CFR 266.34(e))

Does the facility burn hazardous waste fuel: Yes___ No✓

If yes, have they notified of this activity: _____

Is the HW fuel burned in a unit meeting the boiler spec: _____

Have they submitted a burner certification, and are copies on-site: _____

List destination facilities: _____

Comments: _____

40 CFR 266, Subpart E Used oil burned for energy recovery 22a-449(c)-106(a)&(b)

(Note: listed hazardous waste oil must be treated as hazardous waste.)

Does the facility generate___; market___; or burn___ used oil. No

If yes, is it: On-spec___ Off-spec___

If the facility collects or markets used oil: N/A

Have they notified for this activity: _____

Do they have a written waste analysis plan: _____

Are shipments of off-spec fuel oil properly invoiced and retained for 3 years: _____

Are analytical records kept for 3 years: _____

Does the facility market off-spec oil: _____

If yes, do they have burner certifications for all customers: [40 CFR 266.43(b)(5)]

_____

If the facility burns used oil:

Is it off-spec: Yes___ No___

If yes:

Has the facility sent burner certifications to all its marketers: _____

_____

Are invoices and analyses for shipments of off-spec oil kept for 3 years: _____

Is the oil burned in a unit meeting the boiler spec: _____

Comments: _____

_____

40 CFR 266, Subpart F Precious Metal Recovery 22a-449(c)-106(a)

Does the facility generate___; treat___; store___; or dispose___ of precious metals recyclables: No.

_____

If yes, are all shipments manifested: _____

If yes, is precious metal(s) identified on manifest: _____

Are inventories maintained: Yes___ No___

Are all wastes recycled within one year of accumulation dates: Yes___ No___

Is material potentially recyclable: Yes___ No___

Does the material have a means of being recycled: Yes___ No___

Is it economically feasible to recycle it: _____

Comments: _____

_____

_____

40 CFR 263 HAZARDOUS WASTE TRANSPORTATION[3] (TCR) 22a-449(c)-11 & 103

Is this handler involved in waste transportation: Yes___ No_✓_. (If No, skip the rest of this section).
Kinds of waste transported: RCRA___ CT Regulated___
Manifest records retained on-site: Yes___ No___
Comments on manifests: _____
Are hazardous wastes transported in generator's own vehicles, less than 1000 kg/mo of his own waste: Yes___ No___
If NO:
Current State of CT Transporter Permit Yes___ (Permit No. _____) No___
Any vehicle numbers on-site at the time of inspection: Yes___ No___
If YES, permit Number displayed on waste-carrying portion of vehicle (rear and sides, at contrasting color, at least 10 cm. high): Yes___ No___
Personnel trained in emergency response: _____
Wastes stored on-site: Yes___ No___
If YES, is waste stored on vehicles for <72 hours: Yes___ No___[4]
Comments (e.g., compliance with other permit conditions, etc.): _____

[3] Completion of this portion of the RCRA checklist does not constitute a complete evaluation of compliance with transporter permit conditions.

[4] If yes, a permit is required per PA 91-313.

PHOTOS TAKEN

(number, location, brief description or attach photocopy of log)

None

SAMPLES TAKEN

(number, type)

None

COMMENTS ON OTHER AREAS OF ENVIRONMENTAL CONCERN (AIR, WATER, WASTE)

EXIT MEETING

Meeting conducted: Yes ✓ No

List attenders and titles: Cherrie Gillis, Manager Regulatory Affairs.

Mark Parker, Field Inspector 2, D.E.P.

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Site name: MacDermid Inc. Freight Street. Town: Waterbury

Processes Continued

The MIS computer lab is a dry lab with no chemicals in use.

Freight Street Building (227) - Research + Technology. This build cointains labs for new product testing, prototype formulations and equipment for plating/etching.

Ground floor - Electroless Nickel lab where solutions a tested and refined. A satelite electroless Nickel waste drum is store here. When full it is brought to the storage area in the Waste Water treatment room.

Analytical Organic lab (wet) → Chenical analysis of organic solutions utilyzing chromatography, a mobile phase unit and atomic absorption equipment.

Organic Synthesis lab - development and testing of polymer materials for circuit boards.

Mill room → Photo resist compounds are formulated and mixed in small cowles mixers for circuit board coating trials. A PMA solvent (a.k.a N-MPyrol) is used in batches and used to wet rags for cleaning and wipedown of equipment

Photo imaging labs - Dry imaging and physical testing lab for electronic products.

Applications lab - A physical testing lab where photo resist coating is applied to circuit boards, then UV cured and run through developer wash units whichare plumbed to the W.W.T.S.

Solvent Storage room — Virgin solvents and trade chemicals are stored in this room. Satellite drums of photo resist solvent waste (Haz.) and Conn. regulated waste are stored in this room. When full, the drums are moved to the waste storage area in the W.W.T. room. Floor is concrete with a grated drain plumbed to W.W.T.S..

W.W.T. Room → Waste Water Treatment Room. The facility's waste water treatment system. The system consists of three 17,000 gallon batch treatment tanks where chrome reduction, ph adjustment and flocculation/settling is done. The supernatant effluent is pumped out to the P.O.T.W. system. The sludge is accumulated for ~4 months and then pumped out to tanker trucks for shipment (See waste profile F006)

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Lab sinks from both buildings and rinsewaters and floor spills generated from metal finishing areas are plumbed to this W.W.T.S. Once one tank is full the influent waters are diverted to one of the other two tanks while the full tank is batch treated.

The Hazardous waste storage area is located in the W.W.T room. Connecticut regulated wastes, returned rejected product, raw materials and W.W.T. chemicals are stored here. In the room near the W.W.T.S. is the lab pack staging area. The entire room has a sloped concrete floor with epoxy coating and a grated floor sump to collect spills and rinses.

* Second floor

Metal Finishing + industrial products pilot lines — Etchants, cleaners and rinse tanks. Copper/Nickel plating, Zinc/Cobalt plating and chrome plating lines when baths are spent are drummed up and shipped to the Huntingdon Ave facility for reclamation. The Cyanide Copper strike line has two dead rinses which are treated inprocess to destroy cyanide, then dumped to the W.W.T.S.. This is done once a year.

Printed circuit boards finishing → Copper, Zinc and lead plating. Rinse tanks are plumbed to the W.W.T.S. and any unusual bath dumps or spent baths are drummed and shipped to the Huntingdon Ave facility for reclaim. Solder stripping line rinses are plumbed to the W.W.T.S. and spent strip solutions are drummed and shipped.

The chemical storage area contains raw materials for the industrial products and P.C. sides. Two drums of Electroless copper waste (CROH) were stored here also (satellites). The entire storage area is on metal grates over containment pans that are plumbed to the waste water treatment system.

* Third floor.

Research labs — initial product formulations generated in small benchtop labs. One 5 gallon satellite container of MEA mixture. This and any other lab wastes are brought down to the 2nd floor for storage then eventually to the Hazardous waste storage area or lab packed.